

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
PUBLIC REPRESENTATIVE WITNESS NIGEL WATERS, PHD (PR-T-1)

USPS/PR-T1-1. Please explain all of the analytical steps you took, from input data sources, assumptions, data limitations, all processing steps, output data, as the Commission's Rule 31(k) (39 C.F.R. § 3001.31(k)) requires. This documentation should include all data upon which you rely so that your analyses can readily be replicated. Please document each of your tables plus separate results reported in the text.

a. Did you attempt alternative analyses that you ultimately chose not to include in your testimony? If not, why not? If so, please provide a general description of what those efforts attempted to do and why they were ultimately abandoned.

USPS/PR-T1-2. On what date were you contacted about the possibility of your providing testimony in this docket? Had there been any previous discussion about the potential for your testifying at some unknown point in the future? If so, please explain the context.

a. By whom were you contacted? What goals for the research were discussed?

b. Please describe how you arrived at the specific research design you used. What, if any, alternatives were considered and what factors led to the selection you finally made?

c. How long did it take for your contract to be worked out? What details required the most attention to detail? When was it signed?

d. How much time and effort did you put into the contract, including finalization of the testimony? (Please limit any quantified response to hours, leaving specific dollar amounts out.)

e. Did you, whether with the assistance of the Public Representative or otherwise, consider other alternative methods for optimizing a retail network, or were you always focused on the one presented in your testimony? Please explain what alternatives, if any, that were considered and why they were or were not used.

USPS/PR-T1-3. Would it be fair to characterize your testimony as presenting an alternative method for optimizing the Postal Service's retail network? Please explain any equivocation beyond a yes or no response.

a. What is your understanding of the method the Postal Service chose as reflected in this RAOI docket?

b. Do you understand that the Postal Service is attempting to test anything in RAOI? Please explain your response.

c. Do you have any understanding of what the Postal Service expects to learn via RAOI? Please explain your understanding.

d. Does your optimization approach allow the conduct of the testing the Postal Service sought to undertake? Why or why not?

USPS/PR-T1-4. Are you familiar with what witness Boldt characterizes as "alternate access" channels, means by which customer can access postal services without visiting a traditional brick and mortar postal facility operated by

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postal employees? Please explain your understanding or point to the material(s) upon which you base it.

a. To what extent, if at all, does the optimization method you sponsor allows any investigation of how customers do or do not use alternate access methods. Please explain any response that entails a positive response.

b. Did you consider any optimization method that would allow investigation of alternate access utilization? Please explain.

c. What do you understand are the Postal Service's goals are for RAOI?

d. What do you expect the Postal Service will learn from RAOI?

e. Is it your expectation that all of the facilities nominated for discontinuance by RAOI will be formally discontinued? Please explain your expectation and how it developed.

USPS/PR-T1-5. Do you expect that you are technically and professionally competent to conduct any form of optimization that would include investigation of alternate access? Please explain.

a. What proportion of your professional work entails use of geographic toolsets of the type(s) used in your testimony? Please provide a general understanding of your professional work's ambit.

b. What do you see as the benefits of such tools for studying issues with geographic implications?

c. Do you perceive any limitations typical or inherent in use of such tools or the approaches often taken when using them? Please explain.

d. Do you agree that the approach to optimization taken in your testimony assumes that access to retail postal services requires use of a brick and mortar postal facility operated by postal employees? Please explain your response in terms that include the benefits and drawbacks of the approach you take.

e. What is your understanding of how the Postal Service "optimized" its selection of nominee offices included in RAOI?

f. What is your understanding of how the Postal Service could or should have improved the optimality of its selected RAOI offices? Please explain your response.

USPS/PR-T1-6. How often do you visit Post Offices (as that term is applied in the research reported in your testimony) for purposes of accessing postal services?

a. What transactions are typical for you?

b. How frequently do you visit Post Offices?

c. Is the pattern of your visits one that invariably involves a trip from your home to the Post Office and directly back home again? Please explain whatever patterns you can see in your own behavior.

d. Do you ever buy stamps in a pharmacy, grocery store, other retail location, or at an ATM? If so, with what frequency? In what form (roll, booklet,

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Forever Stamps)? Did you make a trip to that location from home? Did you buy anything else? Did you return directly home?

e. Please answer these same questions in terms of others, if any, with whom you live.

f. Is your residence in a rural location? What definition of “rural” are you applying in your response?

USPS/PR-T1-7. Your testimony starts by looking at a geographic area in isolation from its surroundings; then it examines static patterns in population density within that geographic: is this a fair summary? If not, please provide your own summary .

a. Please identify and explain those contexts in which this paradigm both is and is not a good choice, elaborating upon any patterns you see.

b. Can you cite to authoritative sources that address this issue? If so, please do so (and if convenient, provide copies).

c. What classes do you teach to whom?

d. Have you published any professional work in the last six years? If so, please provide a list of them.

USPS/PR-T1-8. You indicate that supporting materials for your testimony are made available in library reference PR-LR-NP-1. From the publicly available description of that material, it appears it was filed in nonpublic form only because some of its source materials were filed that way by the Postal Service. Yet the description keeps the door to its contents firmly closed. Would agree that any publicly sensitive data would relate to specific facilities, and not more generally to your work?

a. Please explain in detail what materials of yours are available in that reference (without repeating materials encompassed by your response to USPS/PR-T1-1).

b. What do “screenshots” illuminate to the reader?

c. What statistical and all other programs do you use (generally)?

i. For the subset consisting of each tool used in the research reported in your testimony, please provide a paragraph describing its usual or appropriate utilization, how you use it, and its acceptance in any scientific community (supported by citations if you have these available).

ii. Is each of these commercially available? If so, how (via SAAS, over the counter package, purchase of an appliance, time on a mainframe, etc.)? If not, was it created by you or a colleague specifically for this project?

d. Is “ESRI” or “Esri” an acronym? What does it stand for?

USPS/PR-T1-9. Did you write the biographical section of your testimony specifically for use in your testimony, or did you pull it from another work? Why is it written in the third person? Please explain.

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USPS/PR-T1-10. Have you previously provided sworn testimony (which would include any depositions)? If so:

- a. Please identify each occasion, the matter involved, the date(s), and your role.
- b. Please explain, for each, whether testimony was written, oral, or both.
- c. For any expert testimony, please either provide a copy or explain in detail what the case was about, your role in the case, the parties for and against whom you testified, whether your testimony was cited in the decision or order that resulted, and your understanding of how your testimony fit into the case [looking for paragraph(s) on each, not pages].

USPS/PR-T1-11. Please detail your undergraduate and graduate school education, including dates, subjects, majors, minors, degrees, schools and locations.

- a. Please provide your work history since getting a PhD.
- b. Does the Postal Service comprise a “transportation system” as you use that term in your biographic paragraph? Please explain.
- c. Does your testimony treat the Postal Service as a “transportation system”? Please explain.

USPS/PR-T1-12. Please explain how the analysis carried out for your testimony demonstrates its effectiveness.

- a. For what purpose is it effective?
- b. Why was your analysis conducted only for Kansas? How was Kansas chosen? What other states (or other geographic areas) were considered before settling on Kansas? Please explain how we got to where we are and why.
- c. Is it your understanding that the United States Postal Service organizes and manages the mail business on a state-specific basis? Please explain your understanding of how the Postal Service is organized.
- d. How well would the analysis you conducted for Kansas work in Alaska, Guam, Puerto Rico; Washington, DC; or Utah? Would there be any limitations upon the analysis, or use of the results in any of these? Please explain.
- e. To your knowledge, which Post Offices (including other classified units) in Kansas have closed? Which ones are closing? How is the status of these offices reflected in your analysis?

USPS/PR-T1-13. Please go through the thirteen lines of two columns in your “Findings” section and explain in terms sensible to a layman what each item in the left column is and what the corresponding term in the right column signifies. Please include in this discussion what other values or choices for the right column could have been selected or chosen, and why each was not.

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PR/USPS-T1-13. Do you agree that your analysis using ‘Thiessen polygons’ defines respective service areas by the location of a Post Office, station or branch? Please explain any disagreement or equivocation regarding agreement.

a. Is it your understanding that the Postal Service operates and manages its domestic service area in similar terms, that is, as a series of service areas each of which is an exclusive unit serving customers located in that area? Please explain your response in terms sensible to a layman.

b. Does the Postal Service classify its customers exclusively by where they live? By where they work? What similarities or differences, including materiality, do you see in which the Postal Service can or does use?

c. Can a customer access postal services by visiting a Post Office near her grandmother’s house?

d. What, if any, ramifications for your optimization does the plurality of choices available to each customer have? Please explain your response.

e. Must postal customers access retail service exclusively via Post Offices, stations and branches? What is your understanding of the range of options available to customers?

f. If you understand 1) that customers have a range of options for access to retail postal services, including contract postal units (CPUs), consignees, postage by fax/phone/mail, Village Post Offices, rural/HCR letter carriers while delivering mail to respective receptacles, Automated Postal Centers (freestanding kiosks), non-personnel units, friends and family, Approved Shippers, among others; 2) that customers are interested in different products and services over time, such as Priority Mail, Express Mail, international postcards, parcel services, sending church bulletins, using Certified Mail or Registered Mail, etc., but that 3) approximately 85 percent of purchases are postage alone, how can the approach used in your testimony optimize customer access to retail services?

g. Is your response to part (f) in any way related to your statement on page 4, lines 17-18 that, “Thiessen polygons can serve as a rough proxy for estimating the dimensions of facility service areas in geographic space”? Please explain your response amenable to understanding by laymen.

PR/USPS-T1-14. Please confirm that your discussion of “expanded service areas” at the top of page 7 refers to what you found to be statistically significant increases in the size of single postal facility service areas, defined as those areas are in your research.

a. What is your understanding of the extent which customers in each facility’s service area make use only of that facility for meeting their needs for access to postal retail services? Please explain your response.

b. Please confirm that discontinuance of specific postal facilities in or near those “expanded service areas” has yet to occur and may not occur. Please explain in detail any failure to confirm.

c. Please confirm that your subsequent “Demographic Analysis” is limited to those three identified “expanded service areas” indicated by blue ovals in the second map in Figure 4.

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d. Please explain how you identify customers in those “expanded service areas” and specify the actual criteria used. To what extent, if at all, do those criteria overlap with distinctions made by postal criteria such as address, five-digit ZIP Code, nine-digit ZIP Code, and city/town name in address?

e. Please provide any statistical analysis of differences between those three “expanded service areas” and the rest of Kansas, including measures of statistical significance and confidence intervals.

USPS/PR-T1-15. Please confirm that the “Nearest Neighbor Analysis” is confined to linear distance between classified postal facilities and does not encompass customer locations or densities.

USPS/PR-T1-16. What experience do you have managing retail networks of any type or size? Please explain in detail any such experience you have.

a. Is it your understanding that the Postal Service’s primary goal in managing the locations of its facilities is to minimize the average distance of the population served by its nearest Post Office?

b. What is your understanding of the Postal Service goal in RAOI?

c. Do you recommend that the Postal Service manage its facilities to this exclusive goal?

d. If the Postal service were to do so, is it your position that the Postal Service could then discontinue more Post Offices?

e. If the Postal Service were to do so, would it also need to relocate facilities in response to changes in how many people live where?

f. Assuming evidence indicated that all customers with jobs access postal facilities nearest to their work locations, In your estimation, should the Postal Service instead conduct its analysis of the types you recommend using work locations for workers and residences for others? Or should it instead assume that workers will take care of access to postal services for their residential households? Please explain your responses.

g. Do you expect that postal management will adopt and undertake the analyses you recommend in your testimony? Why or why not? Please explain your response.

h. Are the suggestions you make in your testimony for locating Post Offices the only reasonable methods of doing so?

i. On page 14, line 8, should the word “exiting” instead read “existing”?